

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VELMA CASTON,

Plaintiff,
-against-

Civil Action No.: 07 CIV 8768 (RWS)

**RESPONSE TO DEFENDANT'S FIRST
REQUEST FOR DOCUMENTS**

CIVIC CENTER MOTORS, LTD. d/b/a
WHITE PLAINS HONDA, and AMERICAN
HONDA FINANCE COMPANY,

Defendant.
-----X

Plaintiffs **VELMA CASTON**, by and through their attorneys, Sadis & Goldberg, LLC, responds and objects to Defendant's **CIVIC CENTER MOTORS, LTD. d/b/a WHITE PLAINS HONDA's** First Request for the Production of Documents as follows:

GENERAL OBJECTIONS

- A. Plaintiffs object to the Definitions and Instructions to the extent they impose any obligations upon the Plaintiff greater than those placed on the Plaintiffs by the Federal Rules of Civil Procedure or applicable court rules.
- B. Plaintiffs object to the requests to the extent that they call for information protected by the attorney/client privilege or attorney work product doctrine. Plaintiffs also object to the extent that the requests call for the production of documents and things that are not within the Plaintiffs' custody, possession or control.
- C. Plaintiffs object to the requests to the extent they seek confidential information about the Plaintiffs. Confidential information shall only be produced after an appropriate confidentiality order is executed by the parties and "so ordered" by the Court.
- D. Plaintiffs reserve their right to supplement these responses and objections. All responses are subject to a responsiveness check and the fact that the Plaintiffs have agreed to produce a category of documents does not mean that such documents exist.
- E. Plaintiffs reserve the right to supplement these responses and objections.

SPECIFIC OBJECTIONS AND RESPONSES

As and for Plaintiff's Responses and Objections to Defendants' First Requests for Production of Documents, Plaintiff responds as follows:

REQUEST 1:

All tapes or digital recordings, video recordings, audio recordings or similar recordings of any conversations or images between plaintiff and defendant, their former or present agents, representatives, or employees.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections, Plaintiff is not in possession of any such recordings.

REQUEST 2:

All documents that plaintiff claims originated from defendant including but not limited to, all records plaintiff received during his visits to defendant, negotiations, agreement to purchase and purchase of a vehicle from defendant or which relate to any of plaintiff's claims, including claims for damages.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections, Plaintiffs has already produced all documents in her possession.

REQUEST 3: Any and all documents that refer and/or relate to any psychiatric, psychological or emotional treatment or diagnosis of plaintiff by a psychiatrist, psychologist, counselor, therapist or other similar health professional during the last ten (10) years.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections, Plaintiff has no documents responsive to this request.

REQUEST 4: Produce duly executed, properly addressed and HIPPA compliant authorizations to enable this office to obtain copies of all hospital, doctor, psychologist, psychiatrist, therapist clinic or other health care provider records, charts, test results, narrative reports, etc., pertaining to all medical conditions and/or emotional distress which plaintiff claims was caused, created and/or exacerbated by the defendants' conduct.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST 5: All documents that refers and/or relates to any other charges, complaints, or lawsuits which plaintiff has participated in any way.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST 6: All documents (including but not limited to written notes, memos, letters and electronically transmitted messages) sent between plaintiff and defendant.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections, Plaintiffs has already produced all documents in her possession.

REQUEST 7: All documents, photographs, pictures, illustrations or videotapes of defendant, or any present or former employee, representative, or agent of defendant.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections, Plaintiffs has already produced all documents in her possession.

REQUEST 8: All diaries, notes, memoranda, day timers, or similar documents relating to any of the allegations made by plaintiff in connection to this lawsuit.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections, Plaintiffs has already produced all responsive documents in her possession.

REQUEST 9: Produce all documents plaintiff intends to use at the time of trial.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections, these documents shall be provided under separate cover as designated by the court.

REQUEST 10: Produce all documents provided to any expert retained by plaintiff. Produce a duly executed authorization to enable this office to obtain plaintiffs pharmaceutical records for the past ten (10) years.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without

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REQUEST 11: Produce a duly executed authorization to enable this office to obtain the records of all psychologists, psychiatrists or other mental health care providers from which plaintiff has sought treatment in the last ten (10) years.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections, Plaintiff states that there are no documents responsive to this request.

REQUEST 12: Identify all persons from whom plaintiff has obtained, received and/or possess written statements and/or affidavits regarding the allegations in this suit and/or the defenses raised in defendant's answer.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections, Plaintiffs has already produced all related documents in her possession.

REQUEST 13: Any and all documents which support any of the allegations of plaintiff's complaint not produced in response to prior production requests.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections, Plaintiffs has already produced all documents in her possession.

REQUEST 14: All documents that relate or refer to any claims by plaintiff that the actions of defendant has resulted in:

- a) actual damages
- b) statutory damages
- c) punitive damages

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence, and in so far as the request seeks documents protected as attorney work product. Subject to and without waiver of these objections, Plaintiffs has already produced all documents in her possession.

REQUEST 15: If the documents responsive to the foregoing demand is not in your possession, provide a duly executed and properly addressed authorization to follow the undersigned to obtain those records directly from those in possession of the records.

RESPONSE:

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not

REQUEST 16: Provide all documents records, video recordings and audio recordings identified in plaintiff's Rule 26(a) Disclosure.

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections, Plaintiff is not in possession of any such recordings.

REQUEST 17: Produce all documents identified in response to defendant's First Set of Interrogatories to plaintiff not produced in response to prior production requests.

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections all related documents were produced in response to defendant's First Set of Interrogatories.

REQUEST 18: Provide copies of all documents in your possession relating to the financing of the purchasing of the vehicle from defendants, including applications, supporting financial documentation submitted therewith, credit reports prepared at the time, commitment letters, letters to/from lenders, offers, denials or conditional offers of credit, retail installment contract, invoices, etc.

Plaintiff objects to this request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of these objections, all such documents were already provided.

REQUEST 19:

If the documents responsive to the foregoing demand is not in your possession, provide a duly executed and properly addressed authorization to follow the undersigned to obtain those records directly from the lender.

See response to Request 18.

REQUEST 20:

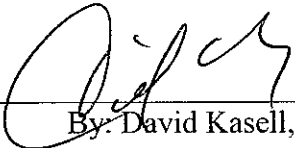
To the extent not produced in answering prior production requests, all documents sent between plaintiff and any present or former employee, representative, or agent of defendant.

See response to Request 18.

REQUEST 21: To the extent not produced in answering prior production requests, all documents which plaintiff received, obtained, or took from defendant or anyone working for defendant, this request includes all documents originating with defendant or their managers, supervisors, employees, representatives or agents which are in plaintiff's possession or control, whether or not the document was specifically intended for plaintiff.

See response to Request 18.

Dated: New York, New York
March 6, 2008



By: David Kasell, Esq. (DK-7753)
SADIS & GOLDBERG LLP
Attorneys for Plaintiff
551 Fifth Avenue, 21st Floor
New York, NY 10176
(212) 947-3793

Statement Date: November 9, 2006

HONDA

Financial Services

Payment Information

Payment Due Date

November 29, 2006

Current Payment Due

\$ 363.70

Total Amount Due

\$ 363.70

Payoff Summary

Payoff Amount

\$ 18,527.89

Payoff Good Through

November 29, 2006

Account Information

Account Number

86396754

Vehicle Description

2006 HONDA CRV4WDEX

VIN Number

SHSRD78876U441268

Regular Payment Amount

\$ 363.70

Maturity Date

October 29, 2012

Payments Remaining

72

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Philadelphia, PA 19101-7829

HONDA

Financial Services

Payment InformationPayment Due Date **December 29, 2006**

Current Payment Due \$ 363.70

Total Amount Due \$ 363.70**Payoff Summary**

Payoff Amount \$ 18,350.73

Payoff Good Through December 29, 2006

Account Information

Account Number 86396754

Vehicle Description 2006 HONDA CRV4WDEX

VIN Number SHSRD78876U441268

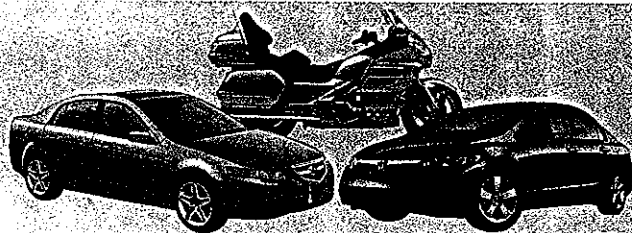
Regular Payment Amount \$ 363.70

Maturity Date October 29, 2012

Payments Remaining 71

Activity Since Last Statement

Date	Description	Amount	Total
11/24/2006	Payment Received - Thank You!		\$ 363.70
	Principal	\$ 206.19	
	Interest	\$ 157.51	

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Happy Holidays!

We would like to wish you
and your family a safe and
joyous holiday season.

HONDA

Financial Services

Payment InformationPayment Due Date **January 29, 2007**

Current Payment Due \$ 363.70

Total Amount Due \$ 363.70**Payoff Summary**

Payoff Amount \$ 18,177.38

Payoff Good Through January 29, 2007

Account Information

Account Number 86396754

Vehicle Description 2006 HONDA CRV4WDEX

VIN Number SHSRD78876U441268

Regular Payment Amount \$ 363.70

Maturity Date October 29, 2012

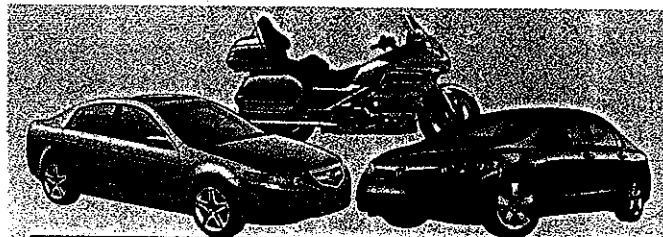
Payments Remaining 70

Prior Year Interest \$ 319.48

Activity Since Last Statement

Date	Description	Amount	Total
12/20/2006	Payment Received - Thank You!		\$ 363.70
	Principal	\$ 201.73	
	Interest	\$ 161.97	

MONTHLY STATEMENT

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HONDA

Financial Services

Payment Information

Payment Due Date **February 28, 2007**

Current Payment Due \$ 363.70

Total Amount Due \$ 363.70

Payoff Summary

Payoff Amount \$ 17,996.83

Payoff Good Through February 28, 2007

Account Information

Account Number 86396754

Vehicle Description 2006 HONDA CRV4WDEX

VIN Number SHSRD78876U441268

Regular Payment Amount \$ 363.70

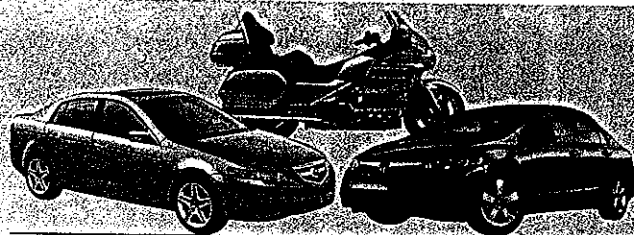
Maturity Date October 29, 2012

Payments Remaining 69

Prior Year Interest \$ 319.48

Activity Since Last Statement

Date	Description	Amount	Total
01/25/2007	Payment Received - Thank You!		\$ 363.70
	Principal	\$ 141.93	
	Interest	\$ 221.77	

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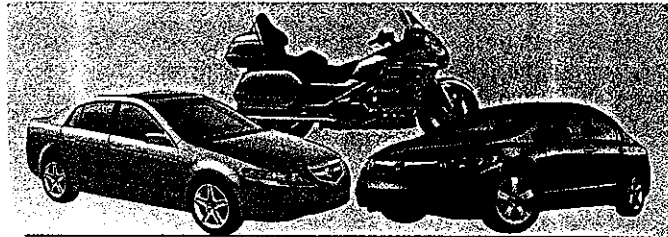
02251 4790276 002254 004504 00001/00001

HONDA

Financial Services

Payment InformationPayment Due Date **March 29, 2007**Current Payment Due **\$ 363.70****Total Amount Due \$ 363.70****Payoff Summary**Payoff Amount **\$ 17,808.58**Payoff Good Through **March 29, 2007****Account Information**Account Number **86396754**Vehicle Description **2006 HONDA CRV4WDEX**VIN Number **SHSRD78876U441268**Regular Payment Amount **\$ 363.70**Maturity Date **October 29, 2012**Payments Remaining **68**Prior Year Interest **\$ 319.48****Activity Since Last Statement**

Date	Description	Amount	Total
02/26/2007	Payment Received - Thank You!		\$ 363.70
	Principal	\$ 168.12	
	Interest	\$ 195.58	

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HONDA

Financial Services

Payment Information

Payment Due Date

April 29, 2007

Current Payment Due

\$ 363.70

Total Amount Due

\$ 363.70

Payoff Summary

Payoff Amount

\$ 17,630.67

Payoff Good Through

April 29, 2007

Account Information

Account Number

86396754

Vehicle Description

2006 HONDA CRV4WDEX

VIN Number

SHSRD78876U441268

Regular Payment Amount

\$ 363.70

Maturity Date

October 29, 2012

Payments Remaining

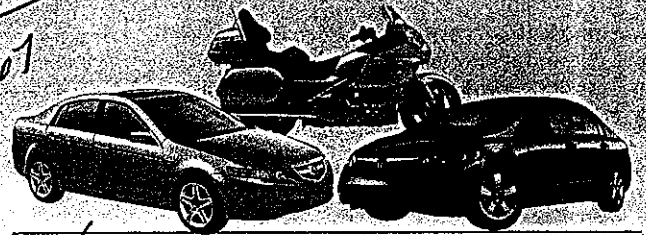
67

Prior Year Interest

\$ 319.48

Activity Since Last Statement

Date	Description	Amount	Total
03/29/2007	Payment Received - Thank You!		\$ 363.70
	Principal	\$ 176.03	
	Interest	\$ 187.67	

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09356 4848930 009367 018722 00001/00001

HONDA

Financial Services

Payment Information

Payment Due Date May 29, 2007

Current Payment Due \$ 363.70

Past Due \$ 363.70

Total Fees Due \$ 10.00

Total Amount Due \$ 737.40

Payoff Summary

Payoff Amount \$ 17,820.47

Payoff Good Through May 29, 2007

187⁰⁰

Charters

Waver

ilp. 59838

may 24

Account Information

Account Number 86396754

Vehicle Description 2006 HONDA CRV4WDEX

VIN Number SHSRD78876U441268

Regular Payment Amount \$ 363.70

Maturity Date October 29, 2012

Payments Remaining 67

This statement includes an amount from a prior billing, which is now past due. Go to hondafinancialservices.com to make one-time payments or contact us for payment arrangements and other options.

Activity Since Last Statement

Date	Description	Amount	Total
05/09/2007	Late Payment Fee	\$ 10.00	*

Wavered - was not date

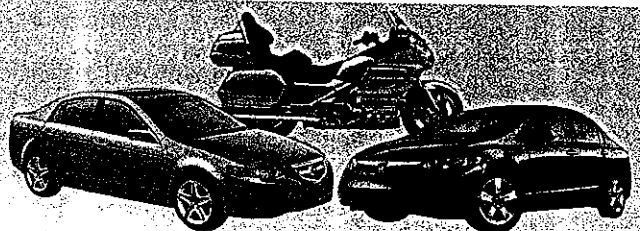
(See June statement)

16147.63

600 5/24

Statement Date: May 9, 2007

MONTHLY STATEMENT



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081244875679 008129 016252 00001/00001

Statement Date: June 7, 2007

HONDA

Financial Services

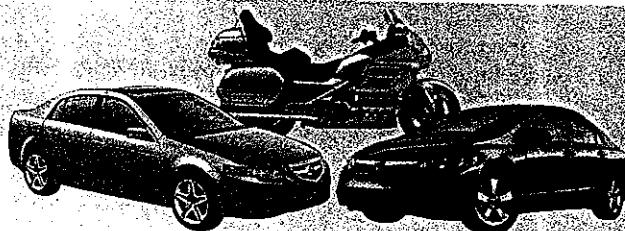
Payment InformationPayment Due Date **June 29, 2007**Current Payment Due \$ 0.00
Total Amount Due \$ 0.00**Payoff Summary**Payoff Amount \$ 16,186.08
Payoff Good Through June 29, 2007**Account Information**Account Number 86396754
Vehicle Description 2006 HONDA CRV4WDEX
VIN Number SHSRD78876U441268
Regular Payment Amount \$ 363.70
Maturity Date October 29, 2012
Payments Remaining 62

Your account is currently partially or fully paid ahead. Please pay the "Total Amount Due" above.

When making early loan payments or payments greater than your "Regular Payment Amount", your principal is reduced and a credit shows toward your next month's payment. By continuing to make payments in excess of your "Regular Payment Amount", you effectively reduce your final payment or shorten the term of your loan.

Activity Since Last Statement

Date	Description	Amount	Total
05/10/2007	Payment Received - Thank You!		\$ 1,187.67
	Principal	\$ 925.95	
	Interest	\$ 251.72	
	Late Payment Fee	\$ 10.00	
05/16/2007	Late Payment Fee		\$ 10.00
05/16/2007	Late Payment Fee Waived		\$ 10.00
05/24/2007	Payment Received - Thank You!		\$ 600.00
	Principal	\$ 520.60	
	Interest	\$ 79.40	

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Philadelphia, PA 19101-7829**Want an impressive place to hang that graduation tassel?**

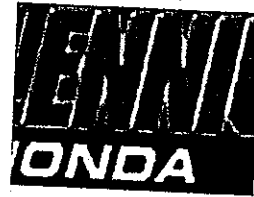
Then consider the rearview mirror of a Honda or Acura. Whether you opt for a new or pre-owned vehicle, you have some big advantages as a recent, or soon-to-be, college graduate. Like flexible financing and lease packages. We may even defer your first payment for 90 days. For more information, go to hondafinancialservices.com. Or visit your dealer. Looks like that diploma's paying off already.

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09695 4900079 009706 019399 00001/00001



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Shopping

Select Style

23,99 34,000

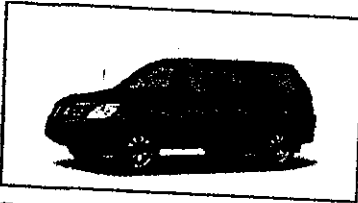
Change Vehicle Make | Model

Select Style >

Select Colors

Select Options

Summary



2006 Honda CR-V
 Front-wheel Drive LX

Select a Style Below

Show differences between styles >

Front-wheel Drive LX

	MSRP ¹	Invoice ²
Base Price	\$20,395	\$18,857
Destination	\$595	\$595
Options	\$0	\$0
Total Price	\$20,990	\$19,452

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Honda CR-V Features

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[Specifications](#)

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¹The manufacturer's suggested retail price is the "sticker price", from which you may be able to negotiate downward.

²The invoice price is a general accounting of what the dealer pays for the car, excluding incentives. Invoice prices are made available by cars.com and are not dealer advertising. All pricing is subject to regional variations. [Click here for more information.](#)

LX	Starting MSRP
Front-wheel Drive	Build w/Options \$20,395
All-wheel Drive	\$21,595
EX	Starting MSRP
Front-wheel Drive	\$22,550
All-wheel Drive	\$22,850
SE	Starting MSRP
All-wheel Drive	\$25,450

320
 8635
 Ret
 91760

Paul V...

after most requests between Cindy Cutler, the former person, Paul Capos the sales person & Paul V. the sales manager. Paul Capos + Paul V. gave me the price of car.

no. Cutler promise me at a higher cost.

On Oct 29, I purchased a 2006 Honda CR-V SE for the dealership. Because they didn't have the White Plains Honda. Paul V. said the car would get me the vehicle from his sister's store in Queens. I left Sept 25000. I trusted him because he was so professional. On Monday I left calling to see if car was on premise. I couldn't get the car because Paul Capos hadn't finish the paper work for the purchase. Finally at approx 7pm - Paul V. called & said to p/u car. He called his manager (no more gas) would sell the car. Since I had left deposit, I told him to please hold the car until Tuesday Oct 31, as I was unable to p/u car at that time of night.

On Tuesday I came + drove my daughter + I came to p/u car. Paul V. told me to make an appt for me w the Honda Service people to have the back wheel service, + also told me she would call + make an appt to have Lo Jack installed, which she never did. When I met w her the following day, from ~~Paul V. November 1st~~ November 1st to have the wheel service - she was very professional male + thorough. She was a different person. She didn't know the address of the Honda service, she said I was up the street somewhere. She asked one of the other sales person to come out + show me direction from the street - he didn't know the address. I spent about 30 minutes trying to find the place. I finally had to stop & ask several people for direction as I was unfamiliar w/ White Plains.

told me to make an appt to come on Wednesday 11

From November 1 - November 10 - I
~~was~~ kept calling Paul G. for the appointment for
 Lo/Jack installment. He didn't return
 any of my calls - No one would call
 me back.

Finally on Saturday November 11th
 We went back to them & told them how
 unprofessional they were.

Mr. Gabriel Casanova - another
 Sales person took over - he got on the
 phone w/ the Service people - made an
 appt w/ my convenes - ~~for the~~ ^{in the} installment of Lo Jack.
 what should have been done ~~for~~ by Mrs.
 Cindy Cubero - Mr. Gabriel Casanova was
 very prof. Very kind & very understanding
 of my situation.

I hope what I wrote them w/
 these people w/ never happen to ~~anyone~~ ^{anyone} else
 I was humiliated, angry & very
 sad. Now Mrs. Cindy Cubero ~~changed~~
 transform into a "Mr. Hyde / Dr. Jekyll"
 personality. after she had gotten my
 Signature & money.

Names

Paul Vilca - Sales manager
Paul CAMAS - person
Cindy Cubero - Financial person
Gabriel CASANOVA - nice Sales person
(who made apt w/ apt / part of service)
- don't know if it's of bad report
there are some bad report

Recording - 1800 542 2432

P/off 18,452²⁸

Valid until 11/17/06

Ehonnie
Ms.

meets 11/06/06

Karen 1800 457-9929

'mummy credit if I buy back'

Valuway Summa

as a ^{re} p users.

John